

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

GEORGE W LOCK
TINA R LOCK

NO. 23-10469 MDC
CHAPTER 13

OBJECTION OF CAB EAST, LLC/FORD MOTOR CREDIT COMPANY, LLC
TO DEBTORS' CHAPTER 13 PLAN [Doc 2]

CAB East LLC by Ford Motor Credit Company, LLC ("Ford Credit") is the owner and lessor of a 2022 Ford Bronco motor vehicle [VIN ...88456] ("Vehicle") leased by Debtor, Tina Lock and non-debtor, Renee Horn, pursuant to a Motor Vehicle Lease dated December 20, 2022, a copy of which is attached as Exhibit A. Ford Credit objects to Debtors' Chapter 13 Plan, for the following reasons:

1. Ford Credit does not accept the Plan. Code §1325(a)(5)(A).
2. The Plan assumes the lease in Part 6 but improperly treats a pre-petition arrear of \$512.00 as a secured claim [Part 4(c)] but indicates that no payment is to come through the Plan (not that it would be acceptable to do so.) No arrangements for payment are indicated and the Plan requires the filing of Proof of Claim [4c];
3. Failure to assume properly the Lease will affect immediate relief from the stay upon confirmation. Code §365(p)(3)
4. The Plan does not require that the Vehicle be continually insured with Ford Credit named as loss payee and additional insured.

WHEREFORE, CAB East, LLC/Ford Motor Credit Company prays this Honorable Court to enter an Order denying confirmation of Debtors' First Amended Plan.

March 9, 2023

GERSHMAN LAW OFFICES, PC

/s/ Howard Gershman

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UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

GEORGE W LOCK
TINA R LOCK

NO. 23-10469 MDC
CHAPTER 13

CERTIFICATION OF SERVICE OF OBJECTION
OF CAB EAST, LLC/FORD MOTOR CREDIT COMPANY, LLC
TO DEBTORS' SECOND AMENDED CHAPTER 13 PLAN

I hereby certify that a true and correct copy of the Objection of CAB East, LLC/Ford Motor Credit Company, LLC to Debtors' Chapter 13 Plan was served upon the following persons by first class mail posted this date:

Kenneth E West, Trustee
1234 Market Street
Ste. 1813
Philadelphia, PA 19107

Brad j Sadek, Esquire
Sadek and Cooper
1500 JFk Blvd., Ste. 220
Philadelphia, PA 19102
brad@sadeklaw.com

Date: March 9, 2023

GERSHMAN LAW OFFICES, PC

/s/ Howard Gershman

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